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15	UNITED STATES DISTRICT COURT	
16	DISTRICT OF NEVADA	
17	JACQUELINE STEINMETZ,	Case No.: 2:19-cv-00070-RFB-CWH
18		
19	Plaintiffs,	JOINT MOTION TO EXTEND TIME FOR
20	NG	PLAINTIFF TO RESPOND TO EXPERIAN INFORMATION
21	VS.	SOLUTIONS, INC.'S MOTION FOR
22	LEXISNEXIS; and EXPERIAN INFORMATION SOLUTIONS, INC.,	RULE 11 SANCTIONS
23	Defendants.	[FIRST REQUEST]
24	Deteridants.	
25		
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28		
20	JOINT MOTION TO EXTEND TIME FOR PLAINTIFF SOLUTIONS, INC.'S MOTION FOR RULE 11 SANCT	

Plaintiff Jacqueline Steinmetz ("Plaintiff") and Defendant, Experian Information Solutions, Inc. ("Experian"), by and through their counsel of record, hereby move jointly to extend Plaintiff's deadline to file a response to Experian's Motion for Rule 11 Sanctions (7) seven days:

- 1. On April 17, 2019, Experian filed a Motion for Rule 11 Sanctions [ECF Dkt.26].
- 2. Plaintiff's Response is due May 1, 2019.
- 3. Plaintiff and Experian have agreed to extend Plaintiff's response seven days in order to allow Plaintiff's counsel to contact the client to address Experian's pending motion for Rule 11 sanctions and obtain approval to file the response. As a result, both Plaintiff and Experian hereby request this Court to further extend the date for Plaintiff to respond to Experian's Motion for Rule 11 Sanctions until **May 8, 2019**. This joint motion is made in good faith, is not interposed

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1 for delay, and is not filed for an improper purpose. 2 Dated April 29, 2019. 3 KNEPPER & CLARK LLC NAYLOR & BRASTER 4 5 /s/ Miles N. Clark /s/ Andrew J. Sharples Matthew I. Knepper, Esq. Jennifer L. Braster, Esq. 6 Nevada Bar No. 12796 Nevada Bar No. 9982 Miles N. Clark, Esq. Andrew J. Sharples, Esq. 7 Nevada Bar No. 13848 Nevada Bar No. 12866 8 10040 W. Cheyenne Ave., Suite 170-109 1050 Indigo Drive, Suite 200 Las Vegas, NV 89129 Las Vegas, NV 89145 9 Email: matthew.knepper@knepperclark.com Email: jbraster@nblawnv.com Email: miles.clark@knepperclark.com Email: asharples@nblawnv.com 10 11 HAINES & KRIEGER LLC **JONES DAY** Cheryl L. O'Connor, Esq. David H. Krieger, Esq. 12 3161 Michelson Drive Nevada Bar No. 9086 Irvine, CA 92612 8985 S. Eastern Avenue, Suite 350 13 Email: coconnor@jonesday.com Henderson, NV 89123 14 Email: dkrieger@hainesandkrieger.com Counsel for Defendant 15 Experian Information Solutions, Inc. Counsel for Plaintiff 16 Steinmetz v. LexisNexis et al 17 18 **ORDER GRANTING** 19 JOINT MOTION TO EXTEND TIME FOR PLAINTIFF TO RESPOND TO **EXPERIAN'S MOTION FOR RULE 11 SANCTIONS** 20

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IT IS SO ORDERED.

UNITED STATES MAGISTRATE JUDGE

Dated: April 30, 2019

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JOINT MOTION TO EXTEND TIME FOR PLAINTIFF TO RESPOND TO EXPERIAN INFORMATION SOLUTIONS, INC.'S MOTION FOR RULE 11 SANCTIONS [FIRST REQUEST] - 3

## **CERTIFICATE OF SERVICE**

Pursuant to Federal Rule of Civil Procedure 5(b), I hereby certify that I am an employee of KNEPPER & CLARK LLC and that on April 29, 2019, I caused the document JOINT MOTION TO EXTEND TIME FOR PLAINTIFF TO RESPOND TO EXPERIAN INFORMATION SOLUTIONS, INC.'S MOTION FOR RULE 11 SANCTIONS to be served through the Court's CM/ECF to all parties appearing in this case.

/s/ Lucille Chiusano

An employee of KNEPPER & CLARK LLC

JOINT MOTION TO EXTEND TIME FOR PLAINTIFF TO RESPOND TO EXPERIAN INFORMATION SOLUTIONS, INC.'S MOTION FOR RULE 11 SANCTIONS [FIRST REQUEST] - 4